

EXHIBIT A

SILVERMAN and ROEDEL, LLC
David S. Silverman, Esq. # 245381971
1187 Main Avenue - Suite 2C
Clifton, New Jersey 07011
Phone No.: (973) 772-6411
Fax No.: (973) 772-6771
Attorneys for Plaintiff

ANA MOREL,

Plaintiff,

vs.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY

DOCKET NO.: PAS-L-

NEW JERSEY MANUFACTURES
INSURANCE COMPANY, AETNA HEALTH
INSURANCE COMPANY and JOHN DOES
1-20 (fictitious names),

Civil Action

SUMMONS

Defendants.

From the State of New Jersey
To the Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court Passaic County 77 Hamilton Street, Paterson, NJ 07505. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your Answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written Answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: September 13, 2019

Michelle M. Smith

Michelle M. Smith, Esq., Superior Court Clerk

Name and Address of Defendant to be served:

New Jersey Manufactures Insurance Company
301 Sullivan Way
West Trenton, NJ 08628

Aetna Health Insurance Company
151 Farmington Avenue, AN33
Hartford, CT 06156

SILVERMAN & ROEDEL LLC
David S. Silverman, Esq., ID# 245381971
1187 Main Avenue, Suite 2C
Clifton, New Jersey 07011
(973)772-6411
Attorneys for plaintiff, Ana Morel

ANA MOREL,

Plaintiff,

v.

NEW JERSEY MANUFACTURERS
INSURANCE COMPANY, AETNA
HEALTH INSURANCE COMPANY,
JOHN DOES 1-20 fictitious name),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY

DOCKET NO.:

Civil Action

COMPLAINT

Plaintiff, ANA MOREL, residing at 389 Colfax Avenue, Clifton, New Jersey by way of

Complaint against the defendants says:

FIRST COUNT

1. On May 24, 2016, plaintiff was injured in a motor vehicle accident which was the fault of another motorist.

2. At all times relevant herein, the defendant, NEW JERSEY MANUFACTURERS INSURANCE COMPANY, is an insurance corporation operating in the State of New Jersey and at all times mentioned herein was and still is engaged in the business of insuring automobiles.

3. The defendant, NEW JERSEY MANUFACTURERS INSURANCE COMPANY, issued to the plaintiff, ANA MOREL., a policy of automobile insurance providing Personal Injury Protection coverage and Underinsured Motorist Coverage and opened a claim under claim number 2016-585301.

4. Said policies were in full force and effect on May 24, 2016.

5. The plaintiff has fully complied with the terms and conditions of the policy in question and has made a demand upon the defendants, NEW JERSEY MANUFACTURERS INSURANCE COMPANY, for benefits under the Personal Injury Protection and Under Insured Motorist portion of said policy. However, the said defendant has refused to honor said demands for coverage.

WHEREFORE, the plaintiff, ANA MOREL, demands judgment against the defendant, NEW JERSEY MANUFACTURERS INSURANCE COMPANY, for payment of personal injury protection benefits and underinsured motorist benefits, pursuant to the terms of the policy in question and for damages together with interest and costs of suit and attorneys fees.

SECOND COUNT

1 Plaintiffs repeat and reiterate the allegations set forth in the First Count hereof as set forth herein.

2. At all times relevant to this action, AETNA HEALTH INSURANCE COMPANY, is an insurance corporation operating in the State of New Jersey and was and still is engaged in the business of insuring automobiles.

3. The said defendant issued to plaintiff, a policy of health insurance providing for payment of medical bills in the event of an automobile accident. The plaintiff was in fact, injured in the subject accident and submitted medical bills to defendant and opened a claim under ID xxxxx0281.

4. Said policies were in full force and effect on May 24, 2016.

5 The plaintiff has fully complied with the terms and conditions of the policy in question

and has made a demand upon the said defendant for medical benefits under said policy.

However, the said defendant has either refused to honor said demands for payment or has paid sums below the normal fee schedule for such services billed.

WHEREFORE, plaintiff demands Judgment against defendant, AETNA HEALTH INSURANCE COMPANY, for medical benefits, pursuant to the terms of the policy in question and for damages, together with interest, costs of suit and attorneys fees.

THIRD COUNT

1. Plaintiffs repeat and reiterate the allegations contained in the First through Fourth Counts hereof as though set forth herein.

2. The defendant, JOHN DOES 1-20, are persons, proprietorships, partnerships, corporations and other legal entities whose identities are presently unknown.

3. Said defendant, JOHN DOES 1-20, and each of them, caused and/ or contributed to the occurrence and the injuries of the Plaintiff in that they were the cause or in some way contributed to the accident in which Plaintiff was injured.

4. As a direct and proximate result of the negligence and carelessness of the Defendants, JOHN DOES 1-20, and each of them, The Plaintiff was caused to sustain injuries as herein set forth.

WHEREFORE, Plaintiff demands Judgment against the Defendants, JOHN DOES 1-20, and each of them, for damages and costs of suit.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

CERTIFICATION

I certify, pursuant to Rule 4:5-1, that to the best of my knowledge, information and belief at this time, the matter in controversy is not the subject matter of any other action pending in any court nor in any pending arbitration proceeding and that no other action or arbitration is contemplated and further that there are no other parties who should be joined in this action.

Dated: September 13, 2019



DAVID S. SILVERMAN, ESQ.

Civil Case Information Statement

Case Details: PASSAIC | Civil Part Docket# L-002872-19

Case Caption: MOREL ANA VS NEW JERSEY
MANUFACTU RES INSUR

Case Initiation Date: 09/13/2019

Attorney Name: DAVID S SILVERMAN

Firm Name: SILVERMAN AND ROEDEL LLC

Address: 1187 MAIN AVENUE SUITE 2C
CLIFTON NJ 070110000

Phone: 9737726411

Name of Party: PLAINTIFF : Morel, Ana

Name of Defendant's Primary Insurance Company
(if known): New Jersey Insurance Company

Case Type: PIP COVERAGE

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

09/13/2019
Dated

/s/ DAVID S SILVERMAN
Signed



SUPERIOR COURT OF NEW
JERSEY
LAW DIVISION:
PASSAIC COUNTY

DOCKET NO. PAS-L-002872-19

AFFIDAVIT OF SERVICE
(for use by Private Service)

Cost of Service pursuant to R4:4-30

\$ _____

Plaintiff
ANA MOREL

Defendant
NEW JERSEY MANUFACTURERS INSURANCE COMPANY, ET AL

Person to be served: NEW JERSEY MANUFACTURERS
INSURANCE COMPANY
Address:
301 SULLIVAN WAY
WEST TRENTON NJ 08628

Attorney:
SILVERMAN & ROEDEL, LLC
1187 MAIN AVENUE SUITE 2C
CLIFTON NJ 07011

Papers Served:
SUMMONS & COMPLAINT

Service Data:

Served Successfully ☒ Not Served _____ Date: 9-16-19 Time: 2:00pm Attempts: _____

_____ Delivered a copy to him/her personally

Name of Person Served and relationship/title

_____ Left a copy with a competent household
member over 14 years of age residing therein at place of abode.

Tanya Spick

☒ Left a copy with a person authorized to accept
service, e.g. managing agent, registered agent, etc.

MANAGING AGENT

Description of Person Accepting Service:

Age: 40 Height: 5'5" Weight: 140 Hair: Brown Sex: Female Race: White

Non-Served:

- () Defendant is unknown at the address furnished by the attorney
() All reasonable inquiries suggest defendant moved to an undetermined address
() No such street in municipality
() No response on: _____ Date _____ Time _____
_____ Date _____ Time _____
_____ Date _____ Time _____

() Other: _____ Comments or Remarks _____

Subscribed and Sworn to me this

16th day of September 2019

I, WILLIE PRYOR, was at
time of service a competent adult not having a direct
interest in the litigation. I declare under penalty
of perjury that the foregoing is true and correct.

Deborah Lynn Grosinski
Notary Signature

Willie Pryor 9/16/19
Signature of Process Server Date

DEBORAH LYNN GROSINSKI
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 10/23/2019

DGR - THE SOURCE FOR LEGAL SUPPORT
1359 Littleton Road, Morris Plains, NJ 07950-3000
(973) 403-1700 Fax (973) 403-9222

Work Order No. 468524
File No. PAS-L-002872-19

Rosemarie D. Berard, Esq. – ID# 032351991
POMEROY, HELLER, LEY, DIGASBARRO & NOONAN, LLC
98 Floral Avenue, Suite 201
New Providence, New Jersey 07974
(973) 467-9600
Attorneys for Defendant, New Jersey Manufacturers Insurance Company
Our File No. 7087-15705

ANA MOREL,

Plaintiff,

vs.

NEW JERSEY MANUFACTURERS
INSURANCE COMPANY, AETNA
HEALTH INSURANCE COMPANY and
JOHN DOES 1-20 (fictitious name),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY

DOCKET NO. PAS-L-2872-19

Civil Action

**ANSWER TO THE COMPLAINT,
CROSSCLAIMS, REQUEST FOR
ALLOCATION, ANSWER TO
CROSSCLAIM, SEPARATE DEFENSES,
TRIAL ATTORNEY DESIGNATION,
RESERVATION OF RIGHT, JURY
DEMAND AND DEMAND FOR
ANSWERS TO INTERROGATORIES**

Defendant, New Jersey Manufacturers Insurance Company, by way of Answer to the Complaint filed herein, alleges and says:

FIRST COUNT

1. Defendant denies the allegations contained in paragraph one of the First Count of the Complaint.
2. Defendant admits the allegations contained in paragraph two of the First Count of the Complaint.
3. This defendant has insufficient knowledge to either admit or deny the allegations of paragraph three of the First Count of the Complaint.
4. This defendant has insufficient knowledge to either admit or deny the allegations of paragraph four of the First Count of the Complaint.

5. Defendant denies the allegations contained in paragraph five of the First Count of the Complaint.

WHEREFORE, defendant, New Jersey Manufacturers Insurance Company, demands judgment.

SECOND COUNT

1. Defendant repeats and re-alleges the allegations in the First Count of the Complaint as though set forth herein in full.

2. This defendant has insufficient knowledge to either admit or deny the allegations of paragraph two of the Second Count of the Complaint.

3. This defendant has insufficient knowledge to either admit or deny the allegations of paragraph three of the Second Count of the Complaint.

4. This defendant has insufficient knowledge to either admit or deny the allegations of paragraph four of the Second Count of the Complaint.

5. This defendant has insufficient knowledge to either admit or deny the allegations of paragraph five of the Second Count of the Complaint.

WHEREFORE, defendant, New Jersey Manufacturers Insurance Company, demands judgment.

THIRD COUNT

1. Defendant repeats and re-alleges the allegations in the First and Second Counts of the Complaint as though set forth herein in full.

2. The allegations contained in paragraph two of the Third Count of the Complaint do not apply to this defendant, and they make no response thereto.

3. The allegations contained in paragraph three of the Third Count of the Complaint do

not apply to this defendant, and they make no response thereto.

4. The allegations contained in paragraph four of the Third Count of the Complaint do not apply to this defendant, and they make no response thereto.

WHEREFORE, defendant, New Jersey Manufacturers Insurance Company, demands judgment.

FIRST SEPARATE DEFENSE

At the time and place mentioned in the Complaint, this defendant violated no legal duty owed to plaintiff.

SECOND SEPARATE DEFENSE

At the time and place mentioned in the Complaint, defendant was not guilty of any negligence which was a proximate cause of the alleged incident, injuries and damages of which plaintiff complain.

THIRD SEPARATE DEFENSE

The claims of the plaintiff are barred in whole or in part by comparative negligence.

FOURTH SEPARATE DEFENSE

Plaintiff's claims are barred by the applicable Statute of Limitations.

FIFTH SEPARATE DEFENSE

Defendant reserves the right to dismiss the Complaint by reason of plaintiff's failure to satisfy the tort threshold requirements of N.J.S.A. 39:6A-1 et seq.

SIXTH SEPARATE DEFENSE

Defendant reserves the right to submit proofs at trial demonstrating that the plaintiff's injuries were caused, in whole or in part, by his/her failure to use seat belts or other safety restraints.

SEVENTH SEPARATE DEFENSE

Plaintiff has failed to comply with the tort threshold governing this lawsuit by reason of which defendant reserves the right to dismiss the underlying Complaint.

EIGHTH SEPARATE DEFENSE

Plaintiff's Complaint fails to state a cause of action for which relief may be granted, and therefore should be dismissed.

CROSSCLAIMS FOR CONTRIBUTION AND INDEMNIFICATION

1. Defendant, New Jersey Manufacturers Insurance Company, demands contribution from all co-defendants, Aetna Health Insurance Company and John Does 1-20 (fictitious name), in accordance with the provisions of the Joint Tortfeasors Contribution law and the Comparative Negligence Act.

2. Defendant, New Jersey Manufacturers Insurance Company, while denying liability to the plaintiff for the action and damages alleged, does hereby assert that any negligence attributable to her was constructive or passive as opposed to the negligence of co-defendants, Aetna Health Insurance Company and John Does 1-20 (fictitious name), which was active and primary;

WHEREFORE, defendant, New Jersey Manufacturers Insurance Company, demands judgment against co-defendants on the theories of indemnification and contribution.

REQUEST FOR ALLOCATION

If any party settles prior to trial, defendant will seek an allocation of the percentage of negligence by the fact finder against the settling party. This defendant shall seek this allocation whether or not it has formally filed a crossclaim against the settling party. Defendant shall rely upon the materials produced in discovery and the evidence introduced at trial in support of the allegations. You are being apprised of this intent pursuant to New Jersey Court Rule 4:7-5(c)

and Young v. Latta, 123 N.J. 584 (1991).

ANSWER TO CROSS-CLAIMS

Defendant, New Jersey Manufacturers Insurance Company, by way of Answer to any and all cross-claims heretofore and hereafter asserted against defendant, respectfully deny each and every allegation contained in any such cross-claims.

RESERVATION OF RIGHT

Defendant reserves the right at or before the time of trial to move for the dismissal of plaintiff's Complaint based upon plaintiff's failure to establish a serious injury within the meaning of N.J.S.A. 39:6A-9.

NOTICE OF DESIGNATION OF TRIAL COUNSEL

Pursuant to R.4:25-4, Rosemarie D. Berard, Esq. is hereby designated as trial counsel.

DEMAND FOR JURY

Defendant hereby demands a trial by jury as to all issues.

DEMAND FOR INTERROGATORIES

Defendant demands of plaintiff answers to uniform interrogatories Form A as contained in the Appendix to the Rules of Court within the prescribed time period, as well as the attached supplemental interrogatories.

CERTIFICATION PURSUANT TO RULE 4:5-1

Pursuant to Rule 4:5-1, defendant hereby certifies that to the best of defendant's knowledge the matter may be the subject of Forthright PIP arbitration.

**POMEROY, HELLER, LEY,
DIGASBARRO & NOONAN, LLC**
Attorneys for Defendant,
New Jersey Manufacturers Insurance Company

BY: Rosemarie D. Berard
Rosemarie D. Berard

DATED: 10/7/19

MAILING CERTIFICATION



I HEREBY CERTIFY that Pomeroy, Heller, Ley, DiGasbarro & Noonan, LLC, Attorneys for Defendant, New Jersey Manufacturers Insurance Company, served a copy of this pleading within the time period allowed under Rule 4:6-1, *et seq.* on this date, via e-Filed.

**POMEROY, HELLER, LEY,
DIGASBARRO & NOONAN, LLC**
Attorneys for Defendant,
New Jersey Manufacturers Insurance Company

BY: Rosemarie D. Berard
Rosemarie D. Berard

DATED: 10/7/19

Appendix XII-B1

		CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
		Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:	
ATTORNEY / PRO SE NAME Rosemarie D. Berard, Esq.		TELEPHONE NUMBER (973) 467-9600		COUNTY OF VENUE Passaic	
FIRM NAME (if applicable) Pomeroy, Heller, Ley, DiGasbarro & Noonan, LLC				DOCKET NUMBER (when available) PAS-L-2872-19	
OFFICE ADDRESS 98 Floral Avenue, Suite 201 New Providence, NJ 07974				DOCUMENT TYPE Answer	
				JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) New Jersey Manufacturers Insurance Company, Defendant		CAPTION Ana Morel v. New Jersey Manufacturers Insurance Company and Aetna Health Insurance Company, et al.			
CASE TYPE NUMBER (See reverse side for listing) 506	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.			
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) New Jersey Manufacturers Insurance Company <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN			
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS			
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION					
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION			
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?			
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .					
ATTORNEY SIGNATURE: <i>Rosemarie D. Berard</i>					

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

**POMEROY, HELLER, LEY,
DIGASBARRO & NOONAN, LLC**

ATTORNEYS AT LAW

DANIEL J. POMEROY*
JOHN M. LEY
KAREN E. HELLER*
PAUL M. DIGASBARRO*
JEFFREY D. NOONAN

98 FLORAL AVENUE
NEW PROVIDENCE, NEW JERSEY 07974
973-467-9600
FAX: 973-467-5055

SANDRA T. FRENCH
BRITTANY L. LUKAC*
~~~  
ROSEMARIE D. BERARD  
OF COUNSEL

\*ALSO ADMITTED IN NY

[www.pomeroyhellerley.com](http://www.pomeroyhellerley.com)

October 4, 2019

**VIA E-FILED**

Clerk, Passaic County Superior Court  
Civil Division, Courthouse  
77 Hamilton Street  
Paterson, NJ 07505

**Re: Ana Morel v. New Jersey Manufacturers Insurance Company and  
Aetna Health Insurance Company, et al.  
Docket No. PAS-L-2872-19  
D/A: May 24, 2016  
NJM Claim Nos. 2016-585301-2 (PIP) & 2016-585301-4 (UM/UTM)  
Our File No. 7087-15705**

Dear Sir/Madam:

Enclosed herewith, for filing, you will please find an Answer and Case Information Statement on behalf of the defendant, New Jersey Manufacturers Insurance Company, with regard to the above-referenced matter. Would you kindly cause the original Answer and CIS to be filed, and the copy returned to the undersigned marked "filed" via e-Courts.

Thank you for your assistance and cooperation.

Very truly yours,

  
Rosemarie D. Berard

RDB/da  
Enclosure

cc: David S. Silverman, Esq. (w/enc.; via e-filed)

## Civil Case Information Statement

### Case Details: PASSAIC | Civil Part Docket# L-002872-19

**Case Caption:** MOREL ANA VS NEW JERSEY  
MANUFACTURES INSURANCE  
**Case Initiation Date:** 09/13/2019  
**Attorney Name:** ROSEMARIE DEEHAN BERARD  
**Firm Name:** POMEROY HELLER & LEY LLC  
**Address:** 98 FLORAL AVENUE  
NEW PROVIDENCE NJ 07974  
**Phone:** 9734679600  
**Name of Party:** DEFENDANT : NEW JERSEY  
MANUFACTURES INSURA  
**Name of Defendant's Primary Insurance Company**  
(if known): NEW JERSEY MANUFACTURES INS CO

**Case Type:** PIP COVERAGE  
**Document Type:** Answer  
**Jury Demand:** YES - 6 JURORS  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/08/2019  
Dated

/s/ ROSEMARIE DEEHAN BERARD  
Signed



